

# COHEN & GREEN

October 4, 2020

Hon. Victor Marrero, U.S.D.J.  
United States District Court  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

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**Re: Jones et al. v. United States Postal Service, 20-cv-6516-VM**

Dear Judge Marrero:

My firm and other counsel who have appeared represent Plaintiffs in the case named above. We write to provide our copy of Defendants' proposed Guidance Memorandum containing our suggested edits in track changes. On the public docket, we are providing a PDF mark-up, but will separately transmit the Track Changes version in Word format to Chambers by email.

Given Defendants' cover letter, we feel it is appropriate to at least briefly remark that Defendants "significant concerns" about edits to the Guidance Memorandum might have been raised in their motion for clarification, but were not. Similarly, by styling the document as a "Supplemental" guidance memorandum, Defendants have attempted to carry forward provisions of two other documents that are inconsistent with the Court's Order (among other things, requiring overtime only where "necessary"). Additionally, we note that Defendants have proposed a reporting system that, while intriguing, raises a number of concerns (noted in the comments). We like the basic concept, but believe that it may be better for the Court to appoint an independent monitor for such reporting.

Otherwise, we believe our proposed changes largely speak for themselves. We are available at the Court's convenience for a conference, should the Court have questions or wish to discuss any issue.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/ Pronouns: Mx., they/ their/ them*

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*Attorneys for Plaintiffs*

The parties are directed to meet and confer to reach an agreement resolving their differences concerning the proposed Guidance Memorandum no later than October 7, 2020.

**SO ORDERED.**

October 5, 2020

DATE

  
VICTOR MARRERO, U.S.D.J.

cc:

All relevant parties by ECF and email.